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May 7, 2025

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VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 14A
New York, NY 10007-1312

ADJOURNED TO WEDNESDAY,
MAY 28, 2025, AT 4:00PM.
SO ORDERED,
5/8/25 Dr. G. Koeltl
✓ S O J

Re: Jan Goodman v. Raju Kothari et al.; Civil Action No. 25-cv-1087

Dear Judge Koeltl:

We represent Plaintiff Jan Goodman in the above-captioned matter. We write to respectfully request that the telephonic appearance scheduled for Monday May 12, 2025 at 3:30 p.m. be adjourned for two weeks, until May 26, 2025, or another date thereafter. There have been no previous requests for an adjournment.

On May 2, 2025, defendant Lawrence Paul, through his counsel Maxim Nowak, requested a pre-motion conference regarding his intent to file a motion to dismiss (ECF No. 14). On May 5, 2025, the Court granted the letter motion for a conference, and directed that the parties appear by phone on May 12, 2025 at 3:30 p.m. (ECF No. 15). However, counsel for Plaintiff are unavailable at that date and time due to previously scheduled appearances/arguments on other matters.

In addition, Joshua Shayne, Esq. is currently preparing his application to appear in this matter *pro hac vice*, and we expect to file his application this week. However, regardless of whether his application is granted prior to May 12, Mr. Shayne is unavailable to appear at the conference on May 12 because he is scheduled to participate in an all-day mediation on another matter.

Defendant Lawrence Paul does not oppose this request. In the interim, counsel will be in touch to discuss this matter and Defendant Paul's intended motion off-record, to ensure that we make the most efficient use of the Court's time at the pre-motion conference. We also note that the Court has scheduled an Initial Conference for July 1, 2025. We do not anticipate that an adjournment of the pre-motion conference will affect the Initial Conference date.

Accordingly, we respectfully ask that the Court adjourn the May 12, 2025 conference until May 26, 2025.

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We thank the Court for its time and attention to this request.

Respectfully submitted,

KAUFMAN BORGEESE & RYAN LLP

A handwritten signature in cursive script, appearing to read "Sara Moriarty".

Sara Moriarty

cc: All counsel of record via ECF

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